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Hearing Date: May 1, 2018 at 10:00 a.m. (prevailing Eastern Time) **Objection Deadline**: April 30, 2018 at 12:00 p.m. (prevailing Eastern Time)

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Counsel to the Plan Administrator for the Debtors

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11

Gawker Media LLC, et al., 1 : Case No. 16-11700 (SMB)

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Debtors. : (Jointly Administered)

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NOTICE OF HEARING ON PLAN ADMINISTRATOR'S MOTION PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(C) SHORTENING NOTICE PERIOD AND SCHEDULING HEARING WITH RESPECT TO PLAN ADMINISTRATOR'S MOTION FOR ENTRY OF AN ORDER PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 APPROVING RELEASE AGREEMENT WITH THIEL PARTIES

PLEASE TAKE NOTICE that on June 10, 2016 (the "<u>Petition Date</u>"), the above-captioned debtors (collectively, the "<u>Debtors</u>") each filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>") with the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that on April 25, 2018, and William D. Holden, as plan administrator for the Debtors (the "<u>Plan Administrator</u>"), filed the *Plan Administrator's*

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. "v.a." (5056). The offices of the Debtors are located at 10 East 53rd Street, New York, NY 10022.

Motion for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 9019

Approving Release Agreement with Thiel Parties (the "Motion to Approve Release Agreement")

[Docket No. 1105] and the Plan Administrator's Motion Pursuant to Federal Rule of Bankruptcy

Procedure 9006(c) Shortening Notice Period and Scheduling a Hearing with Respect to Plan

Administrator's Motion for Entry of an Order Pursuant to Federal Rule of Bankruptcy

Procedure 9019 Approving Release Agreement with Thiel Parties (the "Motion to Shorten

Notice") [Docket No. 1106].

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion to Shorten Notice will be held before the Honorable Stuart M. Bernstein in the United States Bankruptcy Court for the Southern District of New York, Courtroom 723, One Bowling Green, New York, NY 10004, on May 1, 2018 at 10:00 a.m. (prevailing Eastern Time) (the "Hearing").

PLEASE TAKE FURTHER NOTICE that if the Court grants the Motion to Shorten Notice at the Hearing, then the Motion to Approve Release Agreement will also be heard at the Hearing.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion to Approve Release Agreement and Motion to Shorten Notice must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed electronically in text searchable portable document format (PDF) with the Court in accordance with General Order M-399 (General Order M-399 can be found at www.nysb.uscourts.gov, the official website for the Court), by registered users of the Court's case filing system and by all other parties in interest (with a hard-copy delivered directly to the Judge's Chambers), and be served in accordance with General Order M-399, and upon (i) the Plan Administrator for the

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Debtors, Attn: William D. Holden (profinvoices@gawker.com); (ii) counsel to the Plan

Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York,

NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the

United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New

York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) Harder LLP, 132 S. Rodeo Drive,

Fourth Floor, Beverly Hills, CA 90212, Attn: Charles J. Harder (charder@harderllp.com); (v)

counsel to Harder LLP, Norton Rose Fulbright US LLP, 1301 Avenue of the Americas, New

York NY 10019, Attn: Samuel S. Kohn (samuel.kohn@nortonrosefulbright.com); (vi) counsel to

Peter Thiel and Thiel Capital LLC, Skadden, Arps, Slate, Meagher & Flom, LLP, One Rodney

Square, 920 N. King Street, Wilmington DE 19801, Attn: Anthony W. Clark & Robert A. Weber

(robert.weber@skadden.com, anthony.clark@skadden.com); and (vii) those persons who have

formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002, so as

to be actually received on or before 12:00 p.m. (prevailing Eastern Time) on April 30, 2018.

Dated: April 25, 2018

New York, New York

/s/ Gregg M. Galardi

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Counsel to the Plan Administrator for the

Debtors

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